

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

DAVID PEPIN,

Plaintiff,

v.

WISCONSIN CENTRAL LTD, d/b/a CN,

Defendant.

Case No. 2:19-cv-00042

Honorable Hala Y. Jarbou  
Magistrate Judge Maarten Vermaat

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**DEFENDANT'S NOTICE OF DISCOVERY DEPOSITION, *DUCES TECUM*, OF  
MICHAEL H. THOMSON, PH.D., VIA ZOOM**

TO: Attorneys for Plaintiff

PLEASE TAKE NOTICE that defendant, acting through its counsel, Wise Carter Child & Caraway, P.A., will take the Discovery Deposition, *Duces Tecum*, upon oral examination of

Michael H. Thomson, Ph.D. on *Thursday, June 24, 2021 at 10:00 a.m. (EDT)*. The deposition will take place via Zoom.

The deponent is to produce, **by June 14, 2021**, legible copies of the following materials:

1. Deponent's complete file relating to the case of *David Pepin v. Wisconsin Central Ltd d/b/a CN*, including any and all correspondence, billing records, notes, memoranda, reports, photographs, videotape, diagrams, depositions, studies, test results documents and records received from any other source, and all other documents of any kind in the actual or constructive control of deponent relating to the above-described case;
2. Any and all information, documentation, statistics, calculations, or other data used by or on behalf of deponent for the purpose of any conclusion, opinion, or report, generated by or on behalf of deponent in connection with the case of *David Pepin v. Wisconsin Central Ltd d/b/a CN*;
3. The identity of any and all treatises, articles, books, or other materials relied upon by or on behalf of deponent in generating any conclusion, opinion, or report by or on behalf of deponent in connection with the case of *David Pepin v. Wisconsin Central Ltd d/b/a CN* ;
4. A list of any cases in which the deponent has previously offered any lay or expert testimony for or against railroad companies in the last five years;
5. A copy of all 1099 tax statements/forms directed to deponent during the last five years relative to any services provided by deponent; and
6. A copy of deponent's most recent curriculum vitae or resume.

Dated: May 28, 2021

WISE CARTER CHILD & CARAWAY, P.A.

By /s/ Mary C. O'Donnell  
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**CERTIFICATE OF SERVICE**

I, Dawn Taylor, hereby certify that on the date shown below I served a copy of the foregoing **Defendant's Notice of Discovery Deposition, *Duces Tecum*, of Michael H. Thomson,**

**Ph.D., Via Zoom** with the Clerk of the United States District Court via the Court's CM/ECF system which will then send notification of such filing to all counsel of record.

Dated: May 28, 2021

/s/ Dawn Taylor